

UNITED STATES OF AMERICA

v.

Manning, Bradley E.
PFC, U.S. Army,
HHC, U.S. Army Garrison,
Joint Base Myer-Henderson Hall
Fort Myer, Virginia 22211

**STIPULATION OF
EXPECTED TESTIMONY****LCDR Thomas Hoskins, USNR****June 2013**

(U) It is hereby agreed by the Accused, Defense Counsel, and Trial Counsel, that if LCDR Thomas Hoskins, USNR were present to testify during the merits and pre-sentencing phases of this court-martial, he would testify substantially as follows.

1. (U) I am a Lieutenant Commander in the United States Navy Reserves. As a reservist, I am currently assigned to United States Pacific Fleet. In 1997, I obtained a BS in Marine Transportation and a BS in Environmental Science from the Massachusetts Maritime Academy. In 2007, I obtained a Masters of Business Administration from the Naval Postgraduate School.

2. (U) I entered active duty in the United States Navy in 1998 and left active duty in 2009. While on active duty, I was an F-18 pilot. I joined the United States Navy Reserves in 2009. I have logged over 1700 hours as a pilot, to include approximately 320 hours of combat flight time. I have completed the requisite training, to include 6 weeks of ground school, 1 year of primary training for preliminary flight instruction, 1 year of specialty training after I selected intermediate training, and 8 months of advanced training in weapons, formation flying, and carrier landing. After completing that training, I was selected to fly F-18s and received my wings. Thereafter, I completed one year of F-18 training where I received additional training in weapons usage, high and low level deployment of bombs, and carrier flying. As a pilot, I have served as an F-18 division combat lead. I have operated weapons while deployed in Afghanistan and conducted reconnaissance while deployed in Iraq. I have deployed three times in 2001-02, 2003-04, and 2008 in support of OPERATION ENDURING FREEDOM and OPERATION IRAQI FREEDOM. I have also served as a flight instructor for three years.

3. (U) As a reservist, I currently work on planning, which involves concept plans, operations plans, and execution orders. After leaving active duty in 2009, I began to work at Booz Allen as a contractor. Today, I work as a maritime planner for Booz Allen. Previously, I worked for Booz Allen on matters related to United States Northern Command (USNORTHCOM) maritime division. Currently at Booz Allen, I work on USNORTHCOM J6 security cooperation. In my work for the J6, I work on security cooperation between the United States and Mexico. Specifically, I work on command and control of communications, computers, and information (C4I).

4. (U) I have worked with classified information in my career with Booz Allen and as an active duty and reservist pilot. As a pilot, I worked with classified information daily for flights, mission planning, mission briefing, and certain information about the planes. Previously, I worked with classified information in my work at Booz Allen in the J5 pertaining to homeland

defense plans, and planning and development of specific plans for maritime activities, to include work with the United States Coast Guard. I have received an one and one half hour PowerPoint training on classification procedures and spent about an hour quarterly on training. I have received derivative classification training. I have also used classification guides in my work; I have used the USNORTHCOM classification guide to determine the classification status of information. I did not consider the following when making any determination: (1) what, if any, of this material was included in open source reporting and (2) what, if any, of this material was available in unclassified publications (e.g. Army Regulations or Field Manuals).

5. (U) In 2011, I was mobilized to United States Central Command (USCENTCOM). I was mobilized to the J5 (planning) office, Yemen Branch. While in this position, I worked on country-to-country action plans and worked with the United States Embassy in Yemen and the Yemeni military on plans and security cooperation.

6. (U) While mobilized at USCENTCOM, I was tasked through the Task Management Tool to conduct a review for classified information. The J5 office plans through the director, who receives taskers. The director passed the tasker to me. I received the submitted documents from the USCENTCOM JAG office. My assignment required me to determine whether the submitted documents contained classified information at the time they were compromised.

7. (U) In my capacity as the person tasked with reviewing the submitted documents, I reviewed the documents for classified USCENTCOM J5 equities. I reviewed approximately 40 documents pertaining to United States v. Private First Class Bradley Manning, which the prosecution provided to USCENTCOM. The documents provided by prosecution (submitted documents) included, among others, documents from the Combined Information Data Network Exchange Afghanistan (CIDNE-A), and other documents related to the AR 15-6 investigation of the Farah incident.

8. (U) When conducting the review, I looked at USCENTCOM classification guides and Executive Order 13526, and its predecessors. I reviewed each submitted document line by line for classified information by applying the USCENTCOM classification guides. I annotated the basis for each classification decision in my sworn declaration dated 21 October 2011 (BATES numbers: 00527378-00527397). **Prosecution Exhibit (PE) 87 for Identification** is this declaration. All documents noted in the declaration contained classification markings and were properly classified at least at the SECRET level (hereinafter “reviewed documents”).

9. (U) Based on my military experience, I had prior familiarity with the types of documents and information I reviewed. During my deployments, I worked with similar classified information pertaining to mission planning, mission details, weapons systems, and maps of troop locations.

10. (U) The reviewed documents consisted of documents collected from CIDNE-A and other documents related to the Farah investigation. The reviewed documents contained military information, to include military plans, weapons systems, or operations; significant activity reports (SIGACT); operational code words when identified with mission operations; SIGACTs related to fact of and general type of improvised explosive device (IED) attack at specific location on specific date, which would have been known by the enemy that was the subject of

that report; participating units , and details of movements of US friendly forces; concept of operations (CONOPS), Operation Orders (OPORD), or Fragmentary Orders (FRAGOs); vulnerabilities or capabilities of systems, installations, infrastructures, projects, plans, or protection services relating to national security; and limitations and vulnerabilities of US forces in combat area. CONOPs are properly classified as Confidential upon execution and can be declassified one year after completion. Participating units, including types, vulnerabilities, locations, quantities, readiness status, deployments, redeployments, and details of movement of U.S. and friendly forces in operations can be properly declassified upon execution.

11. (U) I reviewed and determined that 21 SIGACTs from CIDNE-A contained classified information according to the classification guides and my knowledge and experience. These reviewed SIGACT reports from CIDNE-A were all marked as “SECRET.” The reviewed SIGACTs from CIDNE-A contained multiple forms of military information, to include information related to deploying quick response forces and code words, reported the effectiveness of IED attacks, which would be known to the enemy that was the subject of that report, report the locations of IED attacks, which would be known to the enemy that was the subject of that report, identified IED tactics, techniques and procedures (TTPs) for responding to IED attacks, identified TTPs for identifying and neutralizing IEDs, friendly action reports of finding and clearing caches, weapons systems and capabilities, sources and methods of intelligence engagement, rules of engagement, CONOPS, descriptions of United States forces, TTPs for mission execution, anticipated enemy reaction, flexible deterrent options, code words, assistance by local foreign nationals in locating suspects, and details of enemy attacks. CONOPs are properly classified as Confidential upon execution and can be declassified one year after completion. Participating units, including types, vulnerabilities, locations, quantities, readiness status, deployments, redeployments, and details of movement of U.S. and friendly forces in operations can be properly declassified upon execution. The 21 CIDNE-A reports that contained J5 equities are located in **Appellate Exhibit (AE) 501** and have the BATES numbers: 00377846-00377846 and 00377888-00377910. These CIDNE-A reports are contained within **PE 8q for ID**.

12. (U) Additionally, I reviewed the AR 15-6 investigation into a military operation that occurred in Farah province, Afghanistan on or about 4 May 2009. The AR 15-6 investigation into the Farah incident was focused on investigating the circumstances surrounding a large-scale civilian casualties (CIVCAS) incident. The incident occurred in Gharani, which is a village in Farah Province, Afghanistan. As noted in **PE 9d for ID**, I found that 13 of the Farah investigation documents contained classified information I believed to be sensitive and classified because the documents reveal TTPs, troop movements, close air support, troops in combat (TIC), and graphics showing troop movements. The Farah investigation documents that contained J5 equities are located in **AE 501** and have the BATES numbers: 00377425-00377480, 00377496, 00377627, 00377672-00377674, 00378029, 00378066, 00378071, 00378079, and 00378082. These documents are contained within **PE 9d for ID**.

13. (U) I reviewed **PE 10b for ID**, a CD contained the video named “BE22 PAX.wmv”. This video (Gharani video) is a video depicting portions of a military operation in Farah Province, Afghanistan, separately from the review I conducted for classified USCENTCOM J5 equities.

(b) (1)

14. (U) While on active duty from 2007-09, I was the strike operations officer responsible for planning, training, coordinating air wing and air-to-ground operations, which involved coordinating with the Army ground liaison for mission coordination of ground targets. In this capacity, I reviewed video recordings of combat missions. The videos captured flight operations using forward looking infrared radar (FLIR). I reviewed the videos to ensure the mission achieved its goal, hit the target, or reviewed the information captured in a reconnaissance capacity. I reviewed hundreds of these videos for validation. The Gharani video is similar to the hundreds of videos I reviewed as a strike operations officer.

15. (U) I reviewed the Gharani video for sensitive military information. I relied on my experience while conducting my review for sensitive and classified information of the Gharani video. In particular, I relied on my training and schooling, experience as a flight instructor, experience with operating FLIR systems, and experience reviewing videos that record imagery as presented in the FLIR system.

16.

(b) (1) (B)

17. (U) After my review of the above referenced documents for USCENTCOM J5 equities, I forwarded my conclusions and recommendations to Deputy Commander, USCENTCOM a Original Classification Authority for his final determination as to whether the information is properly classified.

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